

**SAPONE & PETRILLO, LLP**

MANHATTAN

40 Fulton Street, 17th Floor  
New York, New York 10038  
Telephone: (212) 349-9000  
Facsimile: (212) 349-9003  
E-mail: [ed@saponepetrillo.com](mailto:ed@saponepetrillo.com)

LONG ISLAND

1103 Stewart Avenue, Suite 200  
Garden City, New York 11530  
Telephone: (516) 678-2800  
Facsimile: (516) 977-1977  
E-mail: [bill@saponepetrillo.com](mailto:bill@saponepetrillo.com)

August 8, 2022

**BY ECF FILING**

The Honorable Alvin K. Hellerstein  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Permission for one-day travel to Staten Island is granted. The court will consider community service in the context of a specific proposal.

/s/Alvin K. Hellerstein, U.S.D.J.  
8/9/2022

Re: *United States of America v. Luka Klasinc*  
Ind. No.: 21-CR-443 (AKH)

Dear Judge Hellerstein:

I am counsel to Defendant Luka Klasinc. I write to respectfully request that Your Honor modify Mr. Klasinc's conditions of pretrial release so that tomorrow he may go to the Staten Island Mall, located at 2665 Richmond Avenue, Staten Island, NY 10314, to purchase formal dress-wear for the pre-trial conference scheduled before Your Honor on August 10, 2022. If Your Honor grants this request, my co-counsel, Michael Vitaliano, Esq., will accompany Mr. Klasinc to the Mall.

In addition, we respectfully request permission for Mr. Klasinc to engage in community service, as directed by U.S. Pretrial Services. We have discussed this request with Officer Francesca Piperato who is willing to consider and approve community service appropriate for Mr. Klasinc and to receive reports of completion at the conclusion of each session. Mr. Klasinc will, of course, otherwise abide by all current conditions of home confinement.

Neither the Government, by AUSAs Nicolas and Jones, nor U.S. Pretrial Services, by Officer Piperato, objects to the above requests.

We very much appreciate Your Honor's consideration.

Hon. Alvin K. Hellerstein

August 8, 2022

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Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

cc: AUSA Ashley Carolyn Nicolas (By ECF)  
AUSA Andrew Jones (By ECF)  
U.S. PSO Francesca Piperato (By Email)